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13 **IN THE UNITED STATES DISTRICT COURT**  
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
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17 **In the Matter of the Seizure of:**

18 Any and all funds held in Republic  
19 Bank of Arizona Account(s) xxxx1889,  
20 xxxx2592, xxxx1938, xxxx2912, and  
21 xxxx2500,

22 And all consolidated cases.  
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CASE NO.2:18-cv-6742-RGK (MAAx)

[Related to Case Nos. 18-MJ-00712,  
18-MJ-00713, 18-MJ-00715,  
18-MJ-00716, 18-MJ-00718,  
18-MJ-00719, 18-MJ-00720,  
18-MJ-00721, 18-MJ-00723,  
18-MJ-00724, 18-MJ-00751,  
18-MJ-00797, 18-MJ-00798,  
18-MJ-00996, 18-MJ-00997,  
18-MJ-01427, and 18-MJ-01863]

**DECLARATION OF PAUL J.  
CAMBRIA, JR.**

DECLARATION OF PAUL J. CAMBRIA, JR.

I, Paul J, Cambria, Jr. declare as follows:

1. I am an attorney licensed to practice before this Court. I represent Claimant Michael Lacey in this matter. I have personal knowledge of the following.

2. On August 1, 2018, James Larkin filed a Notice of Motion and Motion to Vacate or Modify Seizure Warrants. (*See* Doc 6.)

3. On August 10, 2018, Mr. Lacey filed a Joinder in Mr. Larkin's Notice of Motion and Motion to Vacate or Modify Seizure Warrants. (*See* Doc 26.)

4. Also, on August 10, 2018, Mr. Lacey filed a Motion for Release of Funds. (*See* Docs. 22-27.)

5. Presently, the hearing on Mr. Larkin's Notice of Motion and Motion to Vacate or Modify Seizure Warrants is scheduled for September 10, 2018. (*See* Doc. 17.) However, the government has submitted a Stipulation and Request for this Court to adjourn the hearing date to September 17, 2018. (*See* Doc. 32.)

6. In light of the fact that Mr. Lacey's counsel will incur out-of-state travel costs for any appearances before this Court, Mr. Lacey respectfully requests that this Court issue an order setting the hearing for Mr. Lacey's Motion for Release of Funds (Doc. 22) on the same date that this Court sets the hearing for Mr. Larkin's Notice of Motion and Motion to Vacate or Modify Seizure Warrants (Doc. 6).

7. An attorney from my office has conferred with the government about this application, and the government has stated that it does not intend to file an opposition.

I swear under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on this 27<sup>th</sup> day of August, 2018, in Buffalo, New York.

/s/ Paul J. Cambria, Jr

**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2018, I filed the foregoing with the United States District Court for the Central District of California using the CM/ECF system.

I hereby certify that on August 27, 2018, a copy of the foregoing was also delivered to the following via CM/ECF:

JOHN K. KUCERA, ESQ.  
Assistant U.S. Attorney  
U.S. Attorney's Office  
Asset Forfeiture Section  
312 North Spring Street  
Los Angeles, CA 90012

Dated: Buffalo, New York  
August 27, 2018

/s/April L. Kelly  
April L. Kelly